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Mr. Sam Borries
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Subject:

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Plainwell No. 2 Dam Area Time-Critical Removal Action
Monthly Report (March 2010)

Dear Sam:

Attached is the 9th monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Plainwell No. 2 Dam Area Time-Critical Removal Action (TCRA). This progress report is submitted in accordance with Paragraph 19a of the June 2009 Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action (Docket No. V-W-09-C-925). On August 5, 2009, the United States Environmental Protection Agency (USEPA) determined that future updates on the Former Plainwell Impoundment TCRA project will be included in this monthly report. Per the August 6, 2009 direction of the USEPA, monthly reports will only be submitted electronically.

If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS



Stephen Garbaciak Jr., P.E.
Vice President

Copies:

Leslie Kirby-Miles, USEPA
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April 15, 2010

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**MONTHLY REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/
KALAMAZOO RIVER SUPERFUND SITE
PLAINWELL NO. 2 DAM AREA TIME-CRITICAL REMOVAL ACTION**

REPORT #9, MARCH 2010

**PREPARED BY ARCADIS
APRIL 15, 2010
ON BEHALF OF GEORGIA-PACIFIC LLC**

SUBMITTED TO

**SAM BORRIES, ON-SCENE COORDINATOR
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Monthly Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site
Plainwell No. 2 Dam Area TCRA**

REPORT #9, MARCH 2010

Significant Developments and Activities During the Period

- On March 1, ARCADIS submitted to United States Environmental Protection Agency (USEPA) a revised version of the *Plainwell No. 2 Dam Area Traffic Control Plan* describing truck routes from the staging areas located on the south side of the river to the landfills.
- On March 5 and 11, ARCADIS submitted to Weston (subcontractor to USEPA) copies of chains-of-custody and/or sample results for samples collected at the Plainwell No. 2 Dam Area TCRA.
- On March 11, USEPA approved the request by Georgia-Pacific (submitted on February 25, 2010) to reduce financial assurance associated with the TCRA. Financial assurance is described in Section XXVI of the AOC.
- On March 15, ARCADIS submitted to USEPA the 8th *Monthly Report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Plainwell No. 2 Dam Area TCRA* for February 2010.
- On March 15, ARCADIS received an executed amendment to the Consumers Energy license agreement originally executed in October 2009.

Data Collected and Field Activities Conducted During the Period

- During the week of March 1, ARCADIS continued installation of access roads on the south side of the river. Soil sample TS10081 was collected from a potential topsoil source located on the Simons' property. The sample was submitted to KAR Laboratories, Inc. (KAR Labs) for diesel range organic (DRO) and gasoline range organic (GRO) analysis and TestAmerica Laboratories, Inc. (TAL) for target compound list (TCL) volatile organic compound (VOC), TCL semi-volatile organic compound (SVOC), polychlorinated biphenyl (PCB), TCL pesticide, total organic carbon (TOC), pH, gradation, and Resource Conservation and Recovery Act (RCRA) metal analysis. Table A summarizes the samples collected.
- During the week of March 7, ARCADIS continued removal of felled trees on the south side of the river.
- No field activities were performed during the weeks of March 15, 22, or 29. Work was suspended due to wet weather conditions.

**Monthly Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site
Plainwell No. 2 Dam Area TCRA**

REPORT #9, MARCH 2010

Laboratory Data Received During the Period

- During the week of March 1, ARCADIS received PCB analytical data for pre-construction soil samples TS10072 through TS10080 (collected in February) from KAR Labs.
- No analytical data were received during the weeks of March 8 or 29.
- During the week of March 15, ARCADIS received DRO and GRO analytical data for topsoil sample TS10081 from KAR Labs.
- During the week of March 22, ARCADIS received PCB, TCL VOC, TCL SVOC, RCRA Metal, TCL pesticide, pH, TOC, and gradation analytical data for topsoil sample TS10081 from TAL.
- No analytical data is pending.

Issues Encountered and Actions Taken

- Geotechnical analytical data (pH, TOC, and gradation) for topsoil sample TS10081 were compared to criteria established in Contract Drawing G-5.2 of the *Plainwell No. 2 Dam Area TCRA Removal Action Final Design Report* (Design Report). The pH and organic content of the sample were outside the ranges established in the Design Report. The topsoil source will not be used for restoration.

Developments Anticipated During the Next Reporting Period

- Throughout April, ARCADIS is tentatively scheduled to continue the construction of Staging Area 1, continue the construction of Staging Area 2, continue clearing and grubbing on the south side of the river, and continue installing access roads on the south side of the river.
- In April, ARCADIS will continue submitting copies of analytical data from Plainwell No. 2 Dam Area TCRA sampling activities to USEPA.

**Monthly Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site
Plainwell No. 2 Dam Area TCRA**

REPORT #9, MARCH 2010

Updates to the Former Plainwell Impoundment TCRA

- On March 5, Michigan Department of Natural Resources and Environment (MDNRE) submitted to Georgia-Pacific and ARCADIS additional backup to support the reimbursement request for response activity and oversight expenses associated with the Former Plainwell Impoundment TCRA received in January. This request is discussed in Section XV of the February 2007 Administrative Settlement AOC for Removal Action. MDNRE also extended the deadline for payment of the reimbursement request by Georgia-Pacific to allow time to review the additional backup.
- On March 5, ARCADIS submitted to USEPA and MDNRE the *Final Construction Completion Report* for the Former Plainwell Impoundment TCRA.
- On March 9, Georgia-Pacific, ARCADIS, and MDNRE discussed the additional backup received to support the reimbursement request for response activity and oversight expenses.
- On March 11, USEPA approved the request by Georgia-Pacific (submitted on February 25, 2010) to reduce financial assurance associated with the Former Plainwell Impoundment TCRA. Financial assurance is described in Section XXIX of the Former Plainwell Impoundment TCRA AOC (Docket No. V-W-07-C-863).
- On March 17 and 18, ARCADIS requested from MDNRE backup for analytical data associated with the reimbursement request for response activity and oversight expenses.
- On March 22, MDNRE submitted copies of a subset of analytical data collected from the Former Plainwell Impoundment TCRA collected by CDM (subcontractor to MDNRE) to ARCADIS.
- On March 26, MDNRE submitted to Georgia-Pacific and ARCADIS an electronic copy of the *Notice of Completion of Work for the Former Plainwell Impoundment Time-Critical Removal Action Allied Paper/Portage Creek/Kalamazoo River Superfund Site, Allegan and Kalamazoo Counties, Michigan* (MDNRE Notice of Completion).
- On March 30, USEPA submitted to Georgia-Pacific and ARCADIS an electronic copy of the *Notice of Completion of Work pursuant to Section XXVIII of Order No. V-W-07-C-863 for the Allied Paper/Portage Creek/Kalamazoo River Superfund Site, Allegan and Kalamazoo Counties, Michigan* (USEPA Notice of Completion).

Developments Anticipated During the Next Reporting Period from the Former Plainwell Impoundment TCRA

- ARCADIS is scheduled to receive a hard copy of the *USEPA Notice of Completion* for the Former Plainwell Impoundment TCRA in April.

Georgia-Pacific LLC
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Plainwell No. 2 Dam Area TCRA
Monthly Report #9, March 2010

Table A — Summary of Samples Collected and Data Received in March 2010

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result (mg/kg)	PCB Action Limit	Response Action / Notes
Property Access Soil Samples									
TS10072	02/08/10	03/04/10	100609	KAR	Access road on Simons property from SA2 to River	PCBs	0.33 U	None	None
TS10073					Access road on Simons property from SA2 to River	PCBs	0.33 U	None	None
TS10074					Access road on Simons property from SA2 to River	PCBs	0.33 U	None	None
TS10075	02/15/10	03/04/10	100610	KAR	Access road on Simons property along River	PCBs	0.86	None	None
[TS10077]					[PCBs]	[0.74]	[None]	[None]	
TS10076					Access road on Simons property along River	PCBs	0.33 U	None	None
TS10078					Access road on McMurtrie property along River	PCBs	0.33 U	None	None
TS10079					Access road on McMurtrie property along River	PCBs	0.33 U	None	None
TS10080					Access road on McMurtrie property along River	PCBs	0.33 U	None	None
Fill Material Sampling									
TS10081	03/04/10	03/18/10 (KAR) / 03/22/10 (TAL)	100783 (KAR) / KAL533 (TAL)	KAR Labs and TAL	9-part composite sample from topsoil source on Simons property	PCBs, TCL VOCs, TCL SVOCs, RCRA Metals, pH, TOC, gradiation, and TCL Pesticides (TAL) DROs and GROs (KAR)	0.081 U	4 mg/kg	Material will not be used ^{1, 2}

Notes:

- 1 - Analytical results compared to applicable Part 201 cleanup criteria and Part 213 RBSLs provided in MDNRE's RRD Operational Memorandum No. 1 (Table 2, Column #19, Direct Contact Criteria & RBSLs).
- 2 - Geotechnical results compared to criteria established in Contract Drawing G-5.2 of the Design Report. The pH and organic content of the sample were outside the ranges established in the Design Report. The topsoil source will not be used for restoration.

* Duplicate samples are shown in brackets.
* Analytical results have not been validated.

DROs - diesel range organics
GROs - gasoline range organics
KAR - KAR Laboratories, Inc.
MDNRE - Michigan Department of Natural Resources and Environment
mg/kg - milligrams per kilogram
PCBs - polychlorinated biphenyls
RBSL - Risk Based Screening Level
RCRA - Resource Conservation and Recovery Act

RRD - Remediation & Redevelopment Division
SA - Staging Area
SVOCs - semivolatile organic compounds
TAL - TestAmerica Laboratories
TOC - total organic carbon
TCL - target compound list
U - Compound analyzed but not detected at a concentration above the reporting limit
VOCs - volatile organic compounds